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ORIGINAL

Docket No. 00-258

EX PARTE OR LATE FILED

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March 1, 2001

The Honorable Michael K. Powell
Mass Media Bureau
Federal Communications Commission
Room 2-C334
445 12th St., SW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIDEO SERVICES
DIVISION
Mar 7 1 22 PM '01

Dear Mr. Powell:

This is written to express the deep concern of the National Technological University (NTU) relative to the FCC recently issued Notice of Proposed Rule Making RM-9920 9911 (NPRM). This notice seeks comments on the proposed reallocation of certain frequency bands for the introduction of advanced 3rd Generation (3G) wireless services. One of the frequency bands being considered in the NPRM is the ITFS band (2500-2690 MHZ). Since 1963 this frequency band has been allocated for educational use by the FCC, and it is being used by schools and colleges nationwide to broadcast educational material.

While NTU does not itself operate an ITFS instructional system, nonetheless, the continued availability of the ITFS frequencies for university instruction in engineering, computer science and management is critical to NTU's operation. Let me briefly explain how many ITFS systems operated by universities contribute to NTU's unique program.

The National Technological University was created in 1984 as a cooperative effort by many major engineering and management colleges in the United States for the graduate and continuing education needs of busy engineers, technical professionals and managers. Today, 52 university campuses are linked by 16 channels of new MPEG2/DVB compressed digital video technology via satellite to workplaces in North America. NTU's vision is to enable working professionals and managers to share premier educational resources via telecommunications. NTU is a private, non-profit, accredited university with more than 1,600 alumni.

NTU instructors are all teaching their courses, not only via NTU satellite, but also delivering these courses through local delivery systems operating systems from their home university. Of the 52 universities in the NTU alliance, over a dozen of the major contributors rely on ITFS systems.

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Arizona State University
Auburn University
Boston University
Clemson University
Colorado State University
Columbia University
Florida Gulf Coast University
The George Washington University
Georgia Institute of Technology
Illinois Institute of Technology
Iowa State University
Kansas State University
Kettering University

Lehigh University
Massachusetts Institute of Technology
Michigan State University
Michigan Technological University
New Jersey Institute of Technology
New Mexico State University
North Carolina State University
Northeastern University
Oklahoma State University
Old Dominion University
Purdue University
Rensselaer Polytechnic Institute
Southern Methodist University

The University of Alabama in Huntsville
The University of Alabama at Tuscaloosa
University of Alaska Fairbanks
The University of Arizona
University of Arkansas
University of California, Berkeley
University of California, Davis
University of Colorado at Boulder
University of Delaware
University of Florida
University of Idaho
University of Illinois at Urbana-Champaign
University of Kentucky

University of Maryland, College Park
University of Massachusetts Amherst
The University of Michigan
University of Minnesota
University of Missouri-Rolla
University of Nebraska-Lincoln
The University of New Mexico
University of Notre Dame
University of South Carolina
University of Southern California
The University of Tennessee, Knoxville
University of Washington
University of Wisconsin-Madison
Vanderbilt University

These include the University of Maryland at College Park, the University of Minnesota and the University of Southern California, among others. If the ITFS frequencies are not preserved for educational use, NTU would lose some of its expert teachers and courses from these outstanding schools.

In this brief letter, it is difficult to outline the scope and breadth of NTU's service to the working technical workforce and the heavy dependence NTU has on the continuation of regular ITFS systems operated by its universities in its alliance. NTU offers M.S. degrees and an MBA. It broadcasts nearly 500 academic courses each year, as well as more than 450 non-credit continuing education courses to a customer list of more than 250 business and government organizations. You or your staff can learn more by visiting www.ntu.edu.

The National Technological University strongly urges the FCC not to reallocate the ITFS frequencies for 3G wireless use.

Sincerely,



André G. Vacroux
President
vacroux@ntu.edu

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